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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

S.L., a minor by and through the
Guardian Ad Litem Kristine Llamas
Leyva, individually and as successor-in-
interest to JOHNNY RAY LLAMAS,
deceased; V.L., by and through the
Guardian Ad Litem Amber Snetsinger,
individually and as successor-in-interest
to JOHNNY RAY LLAMAS, deceased;
and CAROLYN CAMPBELL,
individually,

Plaintiffs,

v.

COUNTY OF RIVERSIDE; SHAWN
HUBACHEK; JIMMIE MCGUIRE; and
DOES 3-10, inclusive,

Defendants.

Case No. 5:24-cv-00249-CAS-SP

Honorable Christina A. Snyder

**APPLICATION FOR LEAVE TO
FILE UNDER SEAL EXHIBIT IN
SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT**

*[Filed concurrently with Declaration of
Benjamin S. Levine; and Proposed
Order]*

Summary Judgment Hearing Date:

June 23, 2025

Time: 10:00 a.m.

Courtroom: 8D

APPLICATION FOR LEAVE TO FILE UNDER SEAL

Pursuant to L.R. 79-5.2.2(b), Plaintiffs V.L., S.L., and Carolyn Campbell respectfully submit their application to file under seal the following document, attached as an exhibit to the Declaration of Benjamin S. Levine in Support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment: (1) "Exhibit 2," containing relevant portions of the transcript of the April 16, 2023, Interview of Defendant Deputy Jimmie McGuire, conducted as part of the Riverside County Sheriff's Department Force Investigations Detail investigation of the subject incident.

The basis for this application is that the foregoing document was designated by Defendants as "Confidential" pursuant to the protective order entered in this matter by Magistrate Judge Sheri Pym on April 24, 2024. [Dkt. 25.] The document is also necessary to Plaintiffs' Opposition to Defendants' Motion for Summary Judgment [Dkt. 43]. Plaintiffs' Opposition is due on June 2, 2025. Although Plaintiffs do not agree with the "Confidential" designation, Plaintiffs are required under the terms of the protective order to submit this application when seeking to file a document another party has designated as "Confidential." [*Id.* at ¶ 12.3.] Plaintiffs defer to the Court as to whether the instant Application should be granted or denied, according to the Court's judgment. [*See id.* ("If a Party's request to file Protected Material under seal is denied by the court, then the Receiving Party may file the information in the public record unless otherwise instructed by the court.").]

DATED: June 2, 2025

LAW OFFICES OF DALE K. GALIPO

Bv /s/ Benjamin S. Levine

Dale K. Galipo
Benjamin S. Levine
Attorneys for Plaintiff V.L.